

SEMERARO & FAHRNEY, LLC

R. Scott Fahrney, Esq. | SBN # 017182008
155 Route 46, Suite 108
Wayne, New Jersey 07470
TEL. (973) 988-5070
Email sfahrney@semerarolaw.com
Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DAVID J. LORENZO,

Plaintiff

vs.

THE BOROUGH OF PALISADES PARK,
NEW JERSEY; CHONG PAUL KIM
(individually and in his official capacity as
Mayor of the Borough of Palisades Park, New
Jersey); and SUK “JOHN” MIN (Individually
and in his official capacity as a member of the
Borough Council of Palisades Park, New
Jersey), STEPHANIE S. JANG (individually
and in her official capacity as a member of
the Borough Council of Palisades Park, New
Jersey, JAE PARK (individually and in her
official capacity as a member of the Borough
Council of Palisades Park, New Jersey),

Defendants.

CIV No.: 2:23-CV-21849-CCC-JRA

A Civil Action

CERTIFICATION OF COUNSEL

I, R. Scott Fahrney, Esq., being of full age, herby certifies as follows:

1. I am an Attorney at Law of the State of New Jersey, licensed to practice before this Court, and am a Partner of the Law Firm of Semeraro & Fahrney, LLC.
2. The undersigned firm has been assigned by the South Bergen Municipal Insurance Fund to represent the Defendants, the Borough of Palisades Park, Chong Paul Kim, and Suk “John” Min, (hereinafter referred to as “Defendants”), with regard to the above captioned matter.
3. As such I am fully familiar with the facts herein.

4. I make this certification in support of the Defendants' Motion to Extend Time to respond to Plaintiff's Amended Complaint to June 28, 2024, pursuant to Fed. R. Civ. P. 7(b) and L. Civ. R. 7(m).
5. On April 25, 2024, Plaintiff filed its Amended Complaint. Initially, the granted an order extending time to respond to the complaint for June 7, 2024.
6. Recently, Plaintiff has filed Motions to Amend his Complaint in a similar State Court (BER-L-6914-22) which now invokes similar claims.
7. Due to this development, the Defense Counsel in that case, the Borough Attorney and the Counsels representing the Defendants in this case need additional time to review both cases and determine whether or not a consolidation action must be pursued.
8. It is respectfully requested that the Court grant this extension so that the undersigned has an opportunity to retrieve the full file and all documents referenced in the complaint, and meet with the client and counsel in order to prepared an appropriate response.
9. The relief requested in this motion does not impact any other deadlines in this case.
10. In light of the above, Defendants respectfully request that this Court grant Defendants' an extension of time to answer or otherwise respond to Plaintiffs' Complaint until June 28, 2024.
11. A proposed order is attached hereto.

I certify under penalty of perjury that the foregoing statements are true and correct.

Semeraro & Fahrney, LLC
Attorneys for Defendants

By: _____


R. Scott Fahrney, Esq.,

Dated: June 6, 2024